

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

**ANTHONY QUINN GIBSON**

**PLAINTIFF**

**VS.**

**CAUSE NO. 3:23-cv-298-DPJ-ASH**

**VITALCORE HEALTH STRATEGIES, LLC**

**DEFENDANT**

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**DEFENDANT VITALCORE HEALTH STRATEGIES, LLC'S  
MOTION FOR SUMMARY JUDGMENT**

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**COMES NOW** the Defendant VitalCore Health Strategies, LLC, by the undersigned counsel, and file this, their Motion for Summary Judgment and would show unto the Court the following:

1. Plaintiff has filed a Complaint against the Defendant in this matter alleging he opposed sexual harassment and refused to participate in illegal activity.
2. No genuine issues of material fact remain as to any of Plaintiff's claims.
3. As a result, summary judgment is warranted, and this matter should be dismissed with prejudice.
4. In support thereof, Defendant relies upon and adopts by reference as if set forth fully herein Defendant's Memorandum of Authorities in Support of its Motion for Summary Judgment, being filed contemporaneously herein.
5. In further support of its Motion, Defendant relies upon the following Exhibits attached hereto:

*Exhibit 1* – VitalCore Health Strategies Employee Handbook

*Exhibit 2* – Deposition of Paul Millette

*Exhibit 3* – Audio call of Gwendolyn Bush refuting Mr. Gibson’s claims

*Exhibit 4* – Deposition of Anthony Gibson

*Exhibit 5* – Text messages between Anthony Gibson and Viola Riggin on  
December 2021

*Exhibit 6* – Deposition of Dr. Raman Singh

*Exhibit 7* – Separation letters for Anthony Gibson and Willie Knighten

*Exhibit 8* – VitalCore Interrogatory Responses

*Exhibit 9* – Health Services Administrator job description

*Exhibit 10* – Deposition of Kathy Hogue

*Exhibit 11* – The American Correctional Association Manual of Accreditation  
Policy and Procedure.

Defendant further relies on all pleadings and submissions within the Court record and  
incorporate the same herein, by reference.

**WHEREFORE, PREMISES CONSIDERED**, Defendant requests that this Court grant  
its Motion for Summary Judgment and dismiss Plaintiff’s Complaint with prejudice.

**RESPECTFULLY SUBMITTED** this 4th day of June, 2024.

**VITALCORE HEALTH STRATEGIES, LLC**

By: /s/Hiawatha Northington II

Hiawatha Northington II, Mississippi Bar No. 10831

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Counsel for VitalCore Health Strategies, LLC

**CERTIFICATE OF SERVICE**

I hereby certify that I have this 4th day of June 2024, served a copy of the foregoing upon all parties to this matter by electronically filing the same with the CM/ECF electronic filing system, which will cause a copy to be electronically served on all counsel of record.

/s/Hiawatha Northington II  
HIAWATHA NORTINGTON II  
*Counsel for VitalCore Health Strategies, LLC*